

October 27, 2008

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20544

Dear Chairman Martin, Commissioner Adelstein, Commissioner Copps, Commissioner McDowell, and Commissioner Tate:

On behalf of the more than 1.1 million subscribers and readers of our publications and electronic newsletters, we are writing to express our grave concern that your plans to change the rules (Docket 04-186) which govern the use of wireless microphones and other wireless audio equipment will make it impossible for them to continue using these products as they do today.

The so-called “White Spaces” are not empty. They are used every day for concerts, corporate events, church services, theater and performance art productions, television broadcasts, professional and collegiate sporting events, and much more...all of which require wireless microphone and instrument systems, in-ear monitors, and production intercom systems.

For more than 30 years, our readers have embraced a wide variety of technologies, but specifically, they have relied heavily on wireless audio equipment. Your vote on November 4th could threaten their ability to conduct their business at a high level of production quality by allowing new consumer wireless devices to interfere with wireless microphones and other wireless equipment. We have three specific concerns:

1. There must be sufficient protected spectrum (that is free from White Space devices) to accommodate any user requiring a moderate number of wireless microphones.
2. To accommodate large-scale events and productions that use many wireless audio devices, it must be possible for performers and touring sound companies to access the proposed online database to protect additional spectrum during the time and at the location of an event.
3. The FCC has proposed that portable White Space devices could rely on ‘spectrum sensing’. The FCC’s recent testing shows that this technology often fails to detect that a wireless microphone is present, yet the Commission appears ready to adopt it as a stand-alone solution. We believe that portable devices also need to employ ‘geolocation’ to prevent interference with both small and large-scale wireless microphone users.

It is critical that the introduction of any new devices into this spectrum be managed carefully. If you allow consumer wireless devices to access the Internet using the same frequencies currently used by wireless audio equipment, these devices will cause catastrophic interference if operated on the same frequency as wireless audio devices.

The livelihoods of our readers and subscribers are at risk. Please do not rush to judgement on this important issue.

Sincerely,

AVTECHNOLOGY

New York, NY



Dallas, TX

Church Production
Magazine

Raleigh, NC

DOWNBEAT
Jazz, Blues & Beyond Since 1934

Chicago, IL

F H
FRONT OF HOUSE

Las Vegas, NV

Lighting & Sound America

New York, NY



ProSoundWeb.com

Boston, MA



New York, NY



Oakland, CA



New York, NY



Chicago, IL



New York, NY



New York, NY



New York, NY



Las Vegas, NV



New York, NY



New York, NY



New York, NY



Queensville, Ontario



Chicago, IL



New York, NY



Raleigh, NC